

EPA Registration # 91234-34

Thornton, Eleanor

From: Nicole O'Loughlin <Nicole@PyxisRC.com>
Sent: Thursday, February 08, 2018 1:49 PM
To: Kraft, Erik; Holloman, Rachel; Schaible, Stephen; Thornton, Eleanor
Cc: Janelle Kay
Subject: Conference Call Follow-up RE: AI reference statement and amendment submission

All,

Thank you for taking the time to discuss this situation and clarify the review policy moving forward. I sincerely apologize for overlooking the difference in signal word between the registrant product and the product referenced in Box 6 of the amendment application. That is not a mistake that will be repeated in future submissions from Pyxis. That said, I appreciate the explanation of what triggers an R340 in this case and understand that asking the Agency to reopen the substantial similarity determination requires more than the breadth of a fast-track amendment.

I will take this information and relay it to Atticus so that they can better plan and manage expectations. In order to make a substantial similarity determination to a product not referenced on the original application for registration, we will amend the registration through an R340 action.

Regards,
Nicole

NICOLE O'LOUGHLIN



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

Thornton, Eleanor

From: Kraft, Erik
Sent: Wednesday, January 31, 2018 3:05 PM
To: Nicole O'Loughlin; Thornton, Eleanor
Cc: Holloman, Rachel
Subject: RE: Reg#91234-34

Nicole,

Your original application didn't cite the reference product as the me-too product. To have the reference statement on your product would require a new tox and chem review by CITAB (which is the definition of a R340) to determine the similarity/identical status between your product and the reference product (new me-too product).

Thanks
Erik

From: Nicole O'Loughlin [mailto:Nicole@PyxisRC.com]
Sent: Wednesday, January 31, 2018 2:53 PM
To: Thornton, Eleanor <Thornton.Eleanor@epa.gov>
Cc: Kraft, Erik <Kraft.Erik@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>
Subject: RE: Reg#91234-34

Dear Ms. Thornton,

Would it be possible to schedule a phone call regarding the result of this amendment with you sometime in the near future?

As per the 2007 EPA Internal Guidance with regards to Active Ingredient Reference Statements (see attached), I submitted a fast-track amendment to have this language added to the label following all of the guidelines closely. It is my understanding that the fast-track amendment would therefore trigger an evaluation of the product formulation against the me-too reference product. This action has been processed as a fast-track non-PRIA amendment by other teams (namely, team 1 & team 20) in recent history.

It is my understanding that an R340 action is an amendment requiring data review within RD. There is no data to submit for this proposed amendment to support the change. Has there been a change in the description for an R340 or some further guidance which suggests an amendment without the submission of data must be submitted under a PRIA category?

I would like to discuss with you why this action is being treated as a PRIA amendment at this time, in seeming contrast from the treatment of this action by other branches.

Regards,
Nicole

NICOLE O'LOUGHLIN



4110 136TH ST CT NW
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F: (253) 853-5516
NICOLE@PYXISRC.COM

-----Original Message-----

From: Thornton, Eleanor [<mailto:Thornton.Eleanor@epa.gov>]

Sent: Wednesday, January 31, 2018 10:19 AM

To: Nicole O'Loughlin <Nicole@PyxisRC.com>

Cc: Kraft, Erik <Kraft.Erik@epa.gov>; Holloman, Rachel <Holloman.Rachel@epa.gov>

Subject: Reg#91234-34

Hi Nicole,

Please see attached signed letter for (A228.01).

Thank you,
Eleanor



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 31, 2018

Ms. Nicole O'Loughlin
Pyxis Regulatory Consulting, Inc.
ATTICUS, LLC
4110 136th Street CT NW
Gig Harbor, WA 98332-9122

Subject: Label Amendment – Revising the label to include an active ingredient reference statement
Product Name: **A228.01**
EPA Registration Number: 91234-34
Application Date: November 1, 2017
Decision Number: 535612

Dear Ms. O'Loughlin:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is not acceptable for the following reasons:

1. The reference to "Contains fluazinam, the active ingredient used in Secure" is not allowed. The label is only allowed to have this statement if both the CITAB tox. and chem. reviews say the product is identical/substantially similar to "Secure", and the CITAB reviews don't say this.
2. If you want this statement you will have to resubmit the action as a PRIA R340 and request a new me-too determination to "Secure" and CITAB must determine that the product is identical/substantially similar to "Secure".

Therefore, your application is not acceptable. No further processing of this application will occur. If you have any questions, please contact Eleanor Thornton by phone at 703-305-6799, or via email at Thornton.eleanor@epa.gov.

Page 2 of 2
EPA Reg. No. 91234-34
Decision No. 535612

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft", with a stylized flourish at the end.

Erik Kraft, Product Manager 24
Fungicide and Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Thornton, Eleanor

From: Kraft, Erik
Sent: Wednesday, January 31, 2018 9:25 AM
To: Thornton, Eleanor
Cc: Holloman, Rachel
Subject: RE: PM Review Requested - Reg#91234-34
Attachments: 91234-00034.pdf; 91234-GU DP441266_46864.pdf

Eleanor,

Please prepare an objection letter. They aren't allowed to have the reference to "Contains fluazinam, the active ingredient used in Secure". They are only allowed to have this statement if both CITAB tox and chem reviews say they are identical/substantially similar to that product, and CITAB reviews don't say that. If they want this statement they have to come in as a PRIA R340 and prove identical/substantially similar to the Secure.

I attached the chem and tox. reviews so that you can see this.

Thanks
Erik

-----Original Message-----

From: Thornton, Eleanor
Sent: Tuesday, January 30, 2018 2:57 PM
To: Kraft, Erik <Kraft.Erik@epa.gov>
Subject: PM Review Requested - Reg#91234-34

-----Original Message-----

From: Thornton, Eleanor
Sent: Tuesday, January 30, 2018 2:53 PM
To: Kraft, Erik <Kraft.Erik@epa.gov>
Cc: Holloman, Rachel <Holloman.Rachel@epa.gov>
Subject: Reg#91234-34

Hi Erik,

Attached for your review and signature is the letter and label for (A228.01).

The registrant is revising the label to include an active ingredient reference statement on the front panel.

Thank you,
Eleanor

Material Sent for Data Extraction

Reg. # 91234-34

Description: MFA PRN 98-10

☒ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☒ Notification Dated 10/06/17

☒ New CSF(s) Dated 9/28/17

☒ Other: Letter dated 1/25/18

☒ Decision #: 535046

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Lisa Austin

Phone: 703-305-7894 Division: RD

Date: 1/25/18



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

- Contains Confidential Business Information -

DP BARCODE No.: 441266; FILE SYMBOL No.: 91234-GU; PRODUCT NAME: A228.01;
DECISION No.: 530140; PC Code(s): 129098; ACTION CODE: R301; FOOD Use: NO

DATE OUT: August 28, 2017

SUBJECT: End Use Product Chemistry Review for "A228.1."
- Substantially Similar ("Me-Too") Registration Claim

FROM: Maria I. Rodriguez, Chemist
Product Chemistry Reviewer
CITAB/RD (7505P)

Maria I. Rodriguez
August 28, 2017.

THROUGH: Shyam Mathur, Ph. D.
Product Chemistry Team Leader
CITAB/RD (7505P)

S. Mathur
8/28/17

TO: Lisa Pahel/Erik Kraft, RM #24
FHB/RD (7505P)

INTRODUCTION:

The CITAB (Chemistry) has been asked to determine the acceptability of supporting Product Chemistry data submitted with this application.

Registrant: Pyxis Regulatory Consulting, Inc., On Behalf of Atticus, LLC

Application Date: June 2, 2017

Proposed Product: Fungicide – pyridinamine class

Supporting Data: Basic CSF, Data Matrix (06-01-2017), Label, Studies with MRID Nos 502759-01 to -03
Claim: Substantially Similar to EPA Reg No 228-737 ("NUP-15013 Fungicide")

45/90-Day Completeness Screen: 07-21-2017 (MIRodriguez); NO Deficiencies Listed

SUMMARY OF FINDINGS:

1. Name(s) of Active Ingredient(s): Fluazinam (40%)
2. Has the registrant claimed substantial similarity to a registered product? [X] Yes; [] No
EPA Reg No 228-737 ("NUP-15013 Fungicide")

DP BARCODE No.: 441266; FILE SYMBOL No.: 91234-GU; PRODUCT NAME: A228.01;
DECISION No.: 530140; PC Code(s): 129098; ACTION CODE: R301; FOOD Use: NO

3. All of the source materials of the active ingredients are derived from registered sources: ☒ Yes; ☐ No
EPA Reg No [REDACTED]

4. All inert ingredients have been screened by CITAB (Inerts) and found to be approved for the proposed labeled use(s): ☒ Yes; ☐ No
-Approved for non-food use (06-09-2017, SM)

5. Confidential Statement(s) of Formula (CSFs):

☒ Proposed Basic CSF: Dated: 05-09-2017; Revised: NA
☐ Proposed Alternate CSF: Dated: NA; Revised: NA

6. Product label:

a. Ingredient statement: Nominal concentration (NC) of AIs listed on CSF concur with product label (PR Notice 91-2): ☒ Yes; ☐ No

Is the sub statement in compliance with PR Notice 97-6 (inert ingredients vs other ingredients)?
☒ Yes; ☐ No

Metallic equivalent: ☐ Yes; ☐ No; ☒ NA
Soluble arsenic: ☐ Yes; ☐ No; ☒ NA
Isomeric ratios: ☐ Yes; ☐ No; ☒ NA
Acid Equivalent: ☐ Yes; ☐ No; ☒ NA

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☐ No; ☒ NA
Methanol at > 4%: ☐ Yes; ☐ No; ☒ NA
Sodium nitrate/Sodium Nitrite: ☐ Yes; ☐ No; ☒ NA

c. Physical-chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for flammability, explosive potential or electric insulator breakdown? ☐ Yes; ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?
☐ Yes; ☐ No; ☒ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes; ☒ No

7. Group A: Product Chemistry Data – Product Identity, Composition, and Analysis

Guideline Number	Study Title		Data Submitted		CITAB's Assessment of CHEMISTRY Data	MRID Number Cited
			Yes	No		
830.1550	Product Identity & Composition		X		A	502759-01 (MSDSs provided)
830.1600	Description of materials used to produce the product		X		A	502759-01
830.1620	Description of the production process		----	----	NA	NA
830.1650	Description of formulation process		X		A	502759-01
830.1670	Discussion on the formation of impurities		X		A	502759-01
830.1700	Preliminary analysis		----	----	NA	NA
830.1750	Certified limits (158.350)	Standard certified limits	X		A	502759-01 Basic CSF (05-09-2017)
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	502759-01 502759-02 HPLC

A = Acceptable; N = Not Acceptable; G = Data Gap; W = Waiver request; NA = Not applicable;
 I = In Progress; U = Upgradeable

8. Group B: Product Chemistry Data – Physical and Chemical Characteristics

Guideline Number	Study Title	Value or Qualitative Description	CITAB's Assessment of CHEMISTRY Data	MRID Number Cited
830.6302	Color	Yellow	A	502759-02
830.6303	Physical State	Liquid	A	502759-02
830.6304	Odor	Pungent odor	A	502759-02
830.6313	Stability to normal and elevated temperatures, metals and metal ions	NA; will not be in contact with metals and metal ions	NA	502759-02
830.6314	Oxidation/reduction	NA; does not contain oxidizing or reducing agents	NA	Data Matrix 502759-03
830.6315	Flammability	Flashpoint > 100 °C	A	502759-02
830.6316	Explodability	NA; does not contain explosive components	NA	Data Matrix 502759-03
830.6317	Storage stability	Stable for 2 weeks @ 54 °C	A	502759-02
830.6319	Miscibility	-Miscible: with water – homogeneous for 30 min @ 25 °C -Not miscible: with solvent oil 150 or acetone – observed separation of solid matter after mixing for 30 min @ 25 °C	A	502759-02
830.6320	Corrosion characteristics	Stable for 2 weeks @ 54 °C (FI-HPDE bottles)	A	502759-02
830.6321	Dielectric Breakdown Voltage	NA; not intended for use around electrical equipment	NA	Data Matrix 502759-03
830.7000	pH	5.5 – 7.5 (5.81 in study table)	A	502759-02
830.7050	UV/Visible Absorption	NA	NA	Data Matrix 502759-03
830.7100	Viscosity	115.27 mPa s @ 20°C	A	502759-02
830.7200	Melting Point	NA	NA	Data Matrix 502759-03
830.7220	Boiling Point	NA	NA	Data Matrix 502759-03
830.7300	Density/Relative Density/Bulk Density (Specific Gravity)	1.27 g/mL @ 20 °C	A	502759-02
830.7370	Dissociation Constants in Water	NA	NA	502759-03
830.7520	Particle Size	NA; not water insoluble & not a fibrous material	NA	Data Matrix 502759-03
830.7550 830.7560 830.7570	Partition Coefficient (n-octanol/water)	NA	NA	Data Matrix 502759-03
830.7840 830.7860	Water Solubility	NA	NA	Data Matrix 502759-03
830.7950	Vapor Pressure	NA	NA	502759-03

A = Acceptable; N = Not Acceptable; G = Data Gap; W = Waiver request; NA = Not applicable; I = In Progress; U = Upgradeable
 * Summary and Waiver Requests

C. CONCLUSIONS:

CITAB has reviewed the Product Chemistry data submitted and has concluded that:

A. Substantial Similarity to the Cited Product from Product Chemistry View Point

- ☐ Similar to cited product
- ☒ Not similar to cited product, EPA Reg No 228-737-("NUP-15013 Fungicide")
The inerts are different for both products
- ☐ Identical to the cited product in chemical composition
- ☐ Not identical
- ☐ Not applicable

B. Confidential Statement(s) of Formula

1. Basic CSF (dated 05-09-2017)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

2. Alternate CSF

- ☐ Acceptable
- ☐ Not Acceptable
- ☒ Not Applicable

C. Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): cite Guideline(s)
- ☐ Not required
- ☐ Data cited

D. Group B Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): cite Guideline(s)
- ☐ Not required
- ☐ Data cited

E. Product Label/Draft Label

Recommendations – Yes ☐; No ☒



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION

20/JUN/2017

MEMORANDUM

Subject: Name of Pesticide Product: A228.01
EPA Reg. No. /File Symbol: 91234-GU
DP Barcode: D440783
Decision No: 530140
Action Code: R301
PC Code: 129098 (fluazinam)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

Through: P.V. Shah, PhD, Chief
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

To: Erik Kraft, Risk Manager Team 24
Fungicide and Herbicide Branch
Registration Division (7505P)

Applicant: Atticus, LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

P.V. Shah
6/22/2017

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Fluazinam	40
Other ingredients:	60
Total:	100

ACTION REQUESTED: Similarity determination for 91234-GU, proposed product, and 228-737, cited product.

BACKGROUND: Atticus, LLC has applied for registration of A228.01, EPA File Symbol 91234-GU, claiming to be substantially similar to NUP-15013 Fungicide, EPA Reg. No. 228-737. Both products contain 40% fluazinam. The submission includes a basic CSF dated May 9, 2017, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies with MRIDs 496085-03 to -08. A search of the OPP electronic databases shows that these studies were submitted to support the registration of the cited product, 228-737. They were reviewed and classified as acceptable in a 2016 CITAB memo (McAndrew; D432894; EPA File Symbol 228-TGT; 30/AUG/2016).

RECOMMENDATIONS:

1. ~~We compared the basic CSFs and labels of the proposed product, 91234-GU, and the cited product, 228-737, and determined that the two products are substantially similar.~~
2. The cited acute toxicity studies are acceptable to support this registration.
3. The acute toxicity profile for the proposed product, A228.01, EPA File Symbol 91234-GU, based on 228-737, is as follows:

acute oral toxicity	III	cited	MRID 49608503
acute dermal toxicity	III	cited	MRID 49608504
acute inhalation toxicity	III	cited	MRID 49608505
primary eye irritation	IV	cited	MRID 49608506
primary skin irritation	IV	cited	MRID 49608507
dermal sensitization	positive	cited	MRID 49608508

4. The proposed basic CSF submitted for 91234-GU must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 091234-GU

PRODUCT NAME: A228.01

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear: Long-sleeved shirt and long pants, socks, shoes and waterproof gloves.

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

November 1, 2017

ELECTRONIC SUBMISSION

Erik Kraft (PM 24)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Atticus, LLC – A228.01 (EPA Reg. No. 91234-34)
Submission of Non-PRIA Fast Track Label Amendment

Dear Mr. Kraft,

On behalf of Atticus, LLC please find the enclosed application to amend the A228.01 (EPA Reg. No. 91234-34) label. Atticus, LLC is revising the label to include an active ingredient reference statement on the front panel. The referenced product contains the same active ingredient as A228.01 and this statement adheres to the guidelines as laid out in the EPA Internal Guidance: Guideline for Active Ingredient Reference Statements on Me-Too Product Labels dated April 13, 2007.

In support of this label amendment, please find the enclosed documents:

1. Completed Application for Amended Registration (EPA Form 8570-1)
2. One (1) copy of the proposed labeling with changes tracked
3. One (1) copy of the proposed labeling with changes incorporated
4. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Atticus, LLC believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me (253-853-7369; Nicole@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole O'Loughlin".

Nicole O'Loughlin

Enclosures

cc: D. Bolin; Atticus, LLC

DOCUMENTUM



Environmental Protection Agency

Washington, DC 20460

Application for Pesticide – Section I

1. Company/Product Number Atticus, LLC / 91234-34	2. EPA Product Manager E. Kraft	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Atticus, LLC / A228.01	PM# 24	
5. Name and Address of Applicant (include ZIP Code) Atticus, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 71512-20 Product Name Fluazinam Turf Fungicide	

Section - II

<input checked="" type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submission of a non-PRIA fast track amendment to add an active ingredient reference statement. As no data are being submitted with this amendment, nor will data need to be reviewed to approved the proposed amendment, Atticus, LLC believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2.5 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Nicole O'Loughlin		Title Regulatory Consultant		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Nicole O'Loughlin		5. Date Nov. 01, 2017			



October 31, 2017

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Atticus, LLC. (EPA Company Number 91234), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

Please note that all Official Mail should be directed to Pyxis Regulatory Consulting, Inc. at the following address:

Pyxis Regulatory Consulting, Inc.
4110 136th Street Ct. NW
Gig Harbor, WA 98332

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Dave G. Bolin'.

Dave G. Bolin, Ph.D.
Director – Regulatory Affairs

cc: Pyxis Regulatory Consulting, Inc.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 7, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MS. NICOLE O'LOUGHLIN
PYXIS REGULATORY CONSULTING, INC.
ATTICUS, LLC.
4110 136TH STREET CT NW
GIG HARBOR , WA 98332-9122

PRODUCT NAME: A228.01
COMPANY NAME: ATTICUS, LLC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 91234-34
EPA RECEIPT DATE: 11/02/17

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 24, at (703) 308-9358.

Sincerely,

Front-End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{1011326*~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 24

Receipt No.

S-

1011326

EPA File Symbol/Reg. No.

91234-34

Pin-Punch Date:

11/2/2017



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: _____

J. GARVIE

Date: _____

11/7/17

Remarks:

DOCUMENTUM



Environmental Protection Agency

United States
Washington, DC 20460

- ☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number Atticus, LLC / 91234-34	2. EPA Product Manager E. Kraft	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Atticus, LLC / A228.01	PM# 24	
5. Name and Address of Applicant (include ZIP Code) Atticus, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 71512-20 Product Name Fluazinam Turf Fungicide	

Section - II

- ☒ Amendment – Explain below. ☐ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____ ☐ "Me Too" Application.
☐ Notification – Explain below. ☐ Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submission of a non-PRIA fast track amendment to add an active ingredient reference statement. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Atticus, LLC believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2.5 gal.	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Nicole O'Loughlin	Title Regulatory Consultant	Telephone No. (Include Area Code) (253) 853-7369
---------------------------	--------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Regulatory Consultant	6. Date Application Received (Stamped)
4. Typed Name Nicole O'Loughlin	5. Date Nov. 01, 2017	

S: 1011326

Milestone Email: Nicole@PyxisRC.com

Regulatory Type: Product Registration - Section 3



Resubmission: ☐ Yes ☒ No

Application Type: Amendment



Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 91234 ATTICUS, LLC.



Risk Manager: Registration Division, Risk Management Team 24



Product #: 91234-34

Product Name: A228.01

Override#:

Me Too
Section3:

Me Too Product
Name:

Application Date: 01-Nov-2017



OPP Rec'd Date: 02-Nov-2017



Front End Date: 06-Nov-2017



Risk Manager Send Date: 07-Nov-2017



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg. #23967. Amendment to add an active ingredient reference statement.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

De

Electronic Label

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 25, 2018

Dave G. Bolin, Ph.D.
Director, Regulatory Affairs
Atticus LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

Subject: Minor Formulation Amendment per PRN 98-10
Product Name: A228.01
EPA Registration Number: 91234-34
Application Date: 10/06/2017
Decision No.: 535046

Dear Dr. Bolin:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 10/06/2017 for **EPA Registration 91234-34**. The Registration Division (RD) has conducted a review of the Confidential Statement of Formula (CSF) submitted with this request for its applicability under PRN 98-10 and finds that the change(s) requested falls within the scope of PRN 98-10. Therefore, revised Basic CSF dated 9/28/2017 **is acceptable**. A copy of the CSF has been added to the registration file for the subject product. Please note that the record for this product currently contains the following CSF:

Basic CSF dated 9/28/2017

Any CSFs other than this listed above are superseded/no longer valid. If you have any questions, please contact me via telephone at 703-305-7894 or e-mail (austin.lisa@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Austin".

Lisa Austin, Ph.D.
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Chemical Safety and Pollution Prevention



Due 11/20/17 MFR

501 Cascade Pointe Lane, Suite 102
Cary, North Carolina 27513

t 984.664.9804
f 984.664.9814

www.AtticusLLC.com

ELECTRONIC SUBMISSION - CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Erik Kraft (PM 24)
Document Processing Desk (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 5-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

September 28, 2017

RE: A228.01 [ABN: Detour 4 SC] (EPA Reg. No. 91234-34)

Notification of Alternate Sources of Inert Ingredients and Additional Formulation Establishments per PRN 98-10

Dear Mr. Kraft,

On behalf of Atticus, LLC, I am notifying the Agency of the following revisions to the formulation for A228.01 (EPA Reg. No. 91234-34):

1. The Basic Confidential Statement of Formula (CSFs) has been revised to include additional formulators;
2. Addition of Alternate Inert Supplier List for the following components.

[REDACTED]

In support of this notification, please find enclosed the following documents:

Completed Application for Pesticide Registration (EPA Form 8570-1)
Revised Basic Formulation dated September 28, 2017 (EPA Form 8570-4)
Formulator's Exemption Statement (EPA Form 8570-27)
Safety Data Sheets for alternate suppliers of inert ingredients. Other representative SDSes may be found in MRID 50275901.

The enclosed Basic CSF is intended to REPLACE the previously approved Basic Formulation dated May 9, 2017.

If you have any questions, please feel free to contact me at (984)-664-9804 or Dave.Bolin@AtticusLLC.com.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Respectfully submitted,

Dave G. Bolin

Dave G. Bolin, Ph.D.
Director - Regulatory Affairs

Inert ingredient information may be entitled to confidential treatment

DOCUMENT



EPA United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number Atticus, LLC / 91234-34		2. EPA Product Manager Erik Kraft	
4. Company/Product (Name) Atticus, LLC/ A228.01 [ABN: Detour 4 SC]		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated XX-XX <input checked="" type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated XX-XX-XX <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) CSF Notification updating the Formulation Facilities and Inert Suppliers This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. <div style="text-align: right;">Dave.Bolin@AtticusLLC.com</div>			
Section III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", Unit Packaging wgt. No. per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gal, 2.5 gal, bulk	
5. Location of Label Directions <input checked="" type="checkbox"/> On Can <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Dave G. Bolin, Ph.D.		Title Director - Regulatory Affairs	
		Telephone No. (Include Area Code) 984-664-9804	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			Date Application Received (Stamped)
2. Signature 		3. Title Director - Regulatory Affairs	
4. Typed Name: Dave G. Bolin, Ph.D.		5. Date: September 28, 2017	



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	EPA File Symbol/Registration Number 91234-34
	Product Name A228.01
	Date of Confidential Statement of Formula (EPA Form 8570-4) 9-28-2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Fluazinam

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1)

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF

(4) The following active ingredients in this product qualify for the formulator's exemption

Source		
Active Ingredient	Product Name	Registration Number
Fluazinam	[REDACTED]	[REDACTED]
Signature 	Name and Title Dave G. Bolin Ph.D. Director - Regulatory Affairs	Date 9/28/2017

EPA Form 8570-27 (Rev. 8-95)

White - EPA copy
 Yellow - Applicant copy

Product ingredient source information may be entitled to confidential treatment



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
ARIANNA@PYXISRC.COM

October 6, 2017

COURIER DELIVERY

ATTN: Molly Clayton
Document Processing Desk (DCI/PRD)
U.S. Environmental Protection Agency (7508P)
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202

RE: Fluazinam (Chemical No. 129098)
Submission of Atticus, LLC's 90-Day Response to Fluazinam Generic Data Call-In
(GDCI-129098-875)
A228.01 (EPA Reg. No. 91234-34)

Dear Ms. Clayton,

On behalf of Atticus, LLC (EPA Company No. 91234), please find the enclosed 90-day response for fluazinam (Chemical No. 129098) Generic Data Call-In for A228.01 (EPA Reg. No. 91234-34) as identified on the Notice of Registration dated September 6, 2017. In support of this submission, please find the following documents:

1. Completed Data Call-In Response Form
2. Letter of Authorization

Please note that, as per the Generic Data Call-In instructions, this product is **exempt** from the requirement to submit or cite generic data concerning the active ingredient because the active ingredient in the product is derived exclusively from purchased, registered pesticide product containing the active ingredient (Section 3(c)(2)(D) of FIFRA); therefore the Requirements Status and Registrant's Response form is not enclosed.

Please feel free to contact me (Arianna@PyxisRC.com; (253) 853-7369) if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink that reads "Arianna Shorey". The signature is written in a cursive, flowing style.


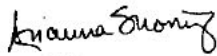
Arianna Shorey

Enclosures

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address Atticus, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th Street Ct., NW Gig Harbor, WA 98332		2. Case # and Name N/A - Fluazinam Chemical # and Name: 129098 Fluazinam		3. Date and Type of DCI and Number 12-Aug-2011 GENERIC ID # GDCL-129098-875	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
91234-34				N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Regulatory Consultant</u> 				9. Date 10/06/2017	
10. Name of Company Atticus, LLC				11. Phone Number 253-253-7369	



501 Cascade Pointe Lane, Suite 102
Cary, North Carolina 27513

t 984.664.9804
f 984.664.9814

www.AtticusLLC.com

February 8, 2017

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay, Mike Kellogg, Ann Tillman, Leanne Pruett, Maryanne Geisbush, Nicole O'Loughlin, Nicki Purnell, Jennifer Yentel, and Arianna Shorey of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Atticus, LLC. (EPA Company Number 91234), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

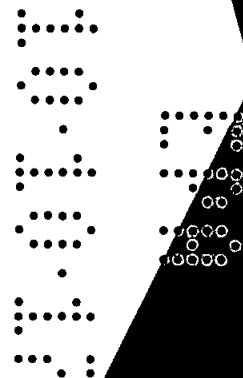
If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Brooke Hedrick'.

Brooke Hedrick
Regulatory Manager & Project Management
Atticus, LLC

cc: Pyxis Regulatory Consulting, Inc.



PROCESSING REQUEST

Reg # 91234-34

Decision # 530140

Description: Adding Basic CSF

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☐ Dated:

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 5/9/17

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Lisa Patel

Division: RD

Phone: 703-347-0459

Date: 9/8/17



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

91234-34

Date of Issuance:

9/6/17

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

A228.01

Name and Address of Registrant (include ZIP Code):

Nicole O'Loughlin
Regulatory Consultant for Atticus, LLC
Atticus, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Erik Kraft, Product Manager 24
Fungicide & Herbicide Branch, Registration Division (7505P)

Date:

9/6/17

2. You are required to comply with the data requirements described in the DCI identified below:

a. Fluazinam GDCI- 129098-875

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: <http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:

- Revise the EPA Registration Number to read, "EPA Reg. No. 91234-34."

4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 05/09/2017

If you have any questions, please contact Lisa Pahel by phone at (703) 347-0459, or via email at pahel.lisa@epa.gov.

Enclosure: Product chemistry review dated 08/28/2017, DP#441266; Similarity clinic memo dated 06/20/2017, DP#440783

[Note to reviewer: [Text] in brackets denotes optional or explanatory language]
[Note to reviewer: {Text} in braces denotes where in the final label text will appear]

{BOOKLET FRONT PANEL LANGUAGE}

GROUP

29

FUNGICIDE

A228.01™

[Alternate brand name: Detour 4 SC]

Active Ingredient:

(% by weight)

Fluazinam: 3-chloro-N-[3-chloro-2,6-dinitro-4-trifluoromethyl) phenyl]-

5-trifluoromethyl-2- pyridinamine (CA)..... 40.0%

Other Ingredients 60.0%

Total 100.0%

Contains 4.24 pounds fluazinam per gallon (508 grams per liter)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

EPA Reg. No.: 91234-XX

EPA Est. No.:

Net Contents:

Manufactured For:

Atticus, LLC

501 Cascade Pointe Lane, Suite 102

Cary, NC 27513

ACCEPTED

09/06/2017

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 91234-34

{LANGUAGE INSIDE BOOKLET}

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything to an unconscious person.
If on skin:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

For Chemical Emergency
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night
Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before use. Do not take internally.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Coveralls worn over long-sleeved shirt, long pants,
- Chemical-resistant gloves made of any waterproof material (such as polyethylene or polyvinyl chloride),
- Protective eyewear,
- Chemical resistant footwear and socks

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Do not allow contact of contaminated clothing with unprotected skin.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break down. Do not allow contact between contaminated sprayer parts and unprotected skin. Ensure sprayer is washed down daily.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas. Runoff and drift from treated areas may be hazardous to aquatic organisms in neighboring areas.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Failure to follow the use directions and precautions on this label may result in turf injury, poor disease control, and/or illegal residues. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Turf grasses on golf courses are not within the scope of the Worker Protection Standard. **Do not enter treated areas until sprays have dried.**

PRODUCT INFORMATION

This product is a broad-spectrum fungicide for use to control diseases of turf grasses on golf courses only. This product may be applied with all types of spray equipment normally used for ground applications on golf courses. Apply this product in sufficient water to obtain adequate uniform coverage of the turf. Apply in a minimum spray volume of 50 gal of water per acre.

USE RESTRICTIONS

- Do not apply this product to home lawns (turf) or any other residential turf
- Do not apply this product by aerial application
- Do not apply this product through any irrigation system
- Do not apply this product within 25 feet of permanent water bodies (lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, and estuaries)
- Do not apply this product within 100 feet of any water bodies that connect with any off-site water bodies such as a freshwater lake, pond, river, stream or wetland in the State of New York.

- Do not apply this product when the wind direction is toward aquatic areas to minimize drift to these areas.
- Do not exceed 253 fl. oz. of this product (8.4 lbs. active ingredient) per acre per year.
- Do not apply more than twelve (12) applications at 0.5 fl. oz. (0.017 lbs. active ingredient) /1000 sq. ft. per year.
- Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.
- Where states have more stringent regulations, they must be observed.

INTEGRATED PEST MANAGEMENT

This product is an excellent disease control agent when used according to label directions for control of a broad spectrum of listed plant diseases. This product is for use in programs which are compatible with the principles of Integrated Pest Management (IPM), which may include the use of disease resistant crop varieties, cultural practices, biological control agents, pest scouting and disease forecasting systems aimed at preventing economic pest damage and reducing unnecessary applications of pesticides. Practices known to reduce disease development should be followed. Consult your state cooperative extension service or local agricultural authorities for additional IPM strategies established in your area. This product may be used in State Agricultural Extension advisory (disease forecasting) programs that recommend application timing based on environmental factors which favor disease development.

RESISTANCE MANAGEMENT

Some plant pathogens are known to develop resistance to products used repeatedly for disease control. This product is effective for strategic use in fungicide disease management programs that attempt to minimize disease resistance to fungicides. This product has a multi-site mode of action that disrupts the energy production in the fungus. It is listed in FRAC code 29, as an uncoupler of oxidative phosphorylation. Some other fungicides, which are at risk from disease resistance, exhibit a single-site mode of fungicidal action. This product, with its multi-site mode of action, may be used to prevent or delay the development of resistance to single-site fungicides when used as a tank-mix partner or alternated in a disease management program.

This product has demonstrated excellent control of *Sclerotinia homeocarpa*, *Lanzia* and *Moellerodiscus* strains (causing Dollar Spot) that are insensitive to several classes of fungicides.

Consult with your Federal or State Cooperative Extension Service representatives for guidance on the proper use of this product in programs that seek to minimize the occurrence of disease resistance to other fungicides. This product is an excellent partner for those products that specify the use of a protectant or other fungicide that has a different mode of action.

PLANT TOLERANCE

NOTE TO USER: Although this product has been evaluated on several turf species with no indication of phytotoxicity, neither the manufacturer nor seller has determined whether or not THIS PRODUCT can be used safely on all turf species. The professional user should determine if this product can be used safely prior to commercial use by testing on the type of turf to be treated at specified rates for phytotoxicity.

MIXING AND SPRAYING

This product can be used effectively in dilute sprays. Thorough, uniform coverage is essential for disease control.

NOTE: Slowly invert container several times to assure uniform mixture.

Prepare only the amount of spray mixture required for immediate use. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary for proper dispersal of the product. Maintain maximum agitation throughout the spraying operation. Do not allow spray mixture to stand overnight or for prolonged periods in the spray tank. Spraying equipment should be thoroughly cleaned immediately after the application.

Product Alone: Fill the spray tank with half of the required amount of water with the agitator running, add this product to the spray tank. Continue agitation while adding the remainder of the water. Begin application of the solution after this product has completely dispersed into the mix water. Maintain agitation until all of the mixture has been applied.

Tank Mixtures: It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture. This product is physically compatible with many products recommended for control of diseases, liquid fertilizers, growth regulators, insecticides and biological control products. If tank mixes are desired, read and follow all directions, precautions, and limitations on labeling of all products used. This product must not be mixed with any product which prohibits such mixing. It is the applicator's responsibility to ensure that the companion product is EPA approved for use on the intended site. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are registered.

This product is generally compatible with the products mentioned above, provided sufficient free water is available for dispersion of all the tank mix products. However, the physical compatibility of this product with tank mix partners should be evaluated before use. A jar test should be conducted with the intended tank-mix products prior to preparation of large volumes. Use the following procedure:

Jar Compatibility Test:

1. Pour the specified proportions of the products into a suitable container of water;
2. Mix thoroughly; and
3. Allow to stand for 5 minutes.

If the combination remains mixed or can be re-mixed readily, it is considered physically compatible. Any physical incompatibility in the jar test indicates that this product should not be used in the tank mix.

Consult compatibility charts or your local or state agricultural authorities for additional compatibility information.

To prepare spray solution:

- Add ½ of the required amount of water to the mix/sprayer tank.
- Start the agitator running before adding any tank mix partners.
- Add the tank mix partners in the following order:
 - Products packaged in water-soluble packaging;
 - Wettable powders;
 - Wettable granules (dry flowables);
 - Liquid flowables (such as this product);
 - Liquids; and
 - Emulsifiable concentrates
- Always allow each tank mix partner to become fully dispersed before adding the next product.
- Provide sufficient agitation while adding the remainder of the water.
- Maintain agitation until all of the mixture has been applied.
- When using this product in tank mixtures, add all products in water-soluble packaging to the tank before any other tank mix partner, including this product.
- Allow the water-soluble packaging to completely dissolve and the product(s) to completely disperse before adding any other tank mix partner to the tank.
- Use a pump with capacity to maintain the correct rated pressure for the nozzles selected.

- Maintain sufficient agitation to keep mixture in suspension.
- Use a jet agitator, liquid sparge tube, or mechanical paddle for agitation.
- Use screens to prevent nozzles from clogging. Use 50-mesh or coarser screens placed after the tank and before the nozzles. Check nozzle manufacturer's directions.
- For more information on spray equipment and calibration, consult sprayer manufacturers and state recommendations.

TURFGRASS DISEASE CONTROL

1. Use this product in a Preventative Disease Control Program.
2. Apply in sufficient water to ensure thorough coverage.
3. Apply after mowing or allow sprayed area to completely dry before mowing.
4. For control of foliar diseases, allow sprayed area to completely dry before irrigation.
5. For optimum turf quality and disease control, use this product in conjunction with turf management practices that promote good plant health and optimum disease control.
6. Evaluate spray additives prior to use. Label directions are based on data obtained with no additives.
7. Before use of any fungicide, proper diagnosis of the organism causing the disease is important. Use of diagnostic kits or other means of identification of the disease organism is essential to determine the best control measures.

USE RATE			
Diseases Controlled Pathogen(s)	Application Interval (days)	Rate fl. oz. product/1000 sq. ft.	Instructions for Use on Golf Course Tees, Greens, Fairways and Roughs
Dollar Spot <i>Sclerotinia homeocarpa</i> <i>Lanzia</i> spp. <i>Moellerodiscus</i> spp.	14	0.5	Apply as a preventative disease program, starting when conditions become favorable for disease. For broad spectrum disease control or for control greater than 14 days, tank mix with the labeled rate of another fungicide labeled for control of this disease.
Leaf spot, Melting-out, Brown blight <i>Drechslera</i> spp. (including <i>D. poae</i> , <i>D. siccans</i>)	14	0.5	Apply when conditions become favorable for disease. For broad spectrum disease control tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Brown patch Large patch <i>Rhizoctonia solani</i>	14	0.5	Begin applications in May or June before disease is present for Brown patch. To control Large patch, apply in fall when temperature drops below 70°F. For broad spectrum control or for control greater than 14 days, tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Red Thread <i>Laetisaria fuciformis</i>	14	0.5	Apply when conditions become favorable for disease.
Anthraxnose <i>Colletotrichum cereal</i>	14	0.5	Applications should be made prior to infection. Alternate or tank mix this product with another fungicide for anthracnose disease prevention. This product should be tank mixed with the labeled rate of another fungicide labeled for control of this disease.

USE RATE			
Diseases Controlled Pathogen(s)	Application Interval (days)	Rate fl. oz. product/1000 sq. ft.	Instructions for Use on Golf Course Tees, Greens, Fairways and Roughs
Gray Snow Mold <i>Typhula</i> spp. Pink Snow Mold <i>Microdochium nivale</i>	Late Fall	0.5	Apply one to two applications in the late fall before snow cover. Do not apply on top of the snow. For optimum disease control, tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Pink patch <i>Microdochium nivale</i>	14	0.5	Apply in the fall or early spring when conditions are favorable for disease development. For optimum disease control, tank mix with the labeled rate of another fungicide labeled for control of this.
Stem rust <i>Puccinia graminis</i> var. <i>graminicola</i>	14	0.5	Apply on a preventative schedule when disease conditions are favorable (cool and cloudy weather).
Algal scum (filamentous blue-green algae/cyanobacteria)	14	0.5	This product should be tank mixed with another fungicide labeled for control of this disease, such as Protect™ DF.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

PESTICIDE STORAGE: Store in original container in a secured, cool, dry place separate from food and feed. **DO NOT** store near heat or open flame.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

[Nonrefillable Containers 5 Gallons or Less]

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. Triple rinse container (or equivalent) promptly after emptying. **Triple rinse as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration.

[Nonrefillable containers larger than 5 gallons]

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over

application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

A228.01 is a trademark of Atticus, LLC

{LANGUAGE ON LABEL AFFIXED TO CONTAINER}

GROUP 29 FUNGICIDE

A228.01™

Active Ingredient: (% by weight)
 Fluazinam: 3-chloro-N-[3-chloro-2,6-dinitro-4-trifluoromethyl) phenyl]-5-trifluoromethyl-2- pyridinamine(CA)..... 40.0%
Other Ingredients 60.0%
Total..... 100.0%

Contains 4.24 pounds fluazinam per gallon (508 grams per liter)

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything to an unconscious person.
If on skin:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

For Chemical Emergency
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night

Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before use. Do not take internally.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment

washwater or rinsate. Do not apply when weather conditions favor drift from treated areas. Runoff and drift from treated areas may be hazardous to aquatic organisms in neighboring areas.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

PESTICIDE STORAGE: Store in original container in a secured, cool, dry place separate from food and feed. **DO NOT** store near heat or open flame.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

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Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

See inside label booklet for additional Precautionary Statements and Directions for Use.

Manufactured for:
 Atticus, LLC
 501 Cascade Pointe Lane, Suite 102
 Cary, NC 27513

EPA Reg. No. 91234-XX
EPA Est. No. _____

NET CONTENTS:

Decision Seq: 530140

Action Code: R301,NEW PRODUCT;IDENTICAL OR SUBSTANTIALLY SIM ... ?

Decision Status

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

FFS Start Date: 26-Jun-2017

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 26-Oct-2017

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date: 26-Jun-2017 FFS Original Decision: ...

Negotiated Due Date:

45-Day Due Date: 10-Aug-2017

Registrant

Predecisional

Due Date: 12-Oct-2017








Add to Bundle? ☐


Response Due Date:

Due Date:

Current Status: PENDING (07-Jun-2017)

Bundle ID:

 75 Day Letters  45/90 Day Screen Primary Decisions Decision Milestone FFS Negotiated Due Dates  OPP Target Due Date  Decision Comments  Payment  Unmatched Payments Decision Ownership  Receipts  Data Package  Reduced Risk  Meetings & Milestones  FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
 S:1004511	Pahel, Lisa	... 91234-GU	26-Oct-2017	PENDING

Registration for new end use product

Viewing Record 1 of 1



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
 (40 CFR 152.85)

Applicant's Name and Address Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	EPA File Symbol/Registration Number 91234-XX
	Product Name A228.01
	Date of Confidential Statement of Formula (EPA Form 8570-4) May 09, 2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Fluazinam

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) of (3).

(3) Indicated by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Fluazinam		
<div>Signature: </div> <div>Name and Title: Nicole O'Loughlin Agent</div> <div>Date: Jun. 01, 2017</div>		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Atticus, LLC c/o Pyxis Regulatory Consulting, Inc.; 4110 136 th St. Ct. NW Gig Harbor, WA 98332; (253) 853-7369	EPA Registration Number/File Symbol 91234-XX
Active Ingredient(s) and/or representative test compound(s) Fluazinam	Date Jun. 01, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial nonfood	Product Name A228.01

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Jun. 01, 2017	Typed or Printed Name and Title Nicole O'Loughlin Regulatory Consultant
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date Jun. 1, 2017	EPA Reg No./File Symbol 91234-XX	Page 1 of 4
Applicant's/Registrant's Name & Address Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	Product A228.01	

Ingredient: Fluazinam (CAS No. 79622-59-6; Chemical Code: 129098)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product identity and composition	50275901	Atticus, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	50275901	Atticus, LLC	OWN	
830.1620	Description of the Production Process				Not required
830.1650	Description of the Formulation Process	50275901	Atticus, LLC	OWN	
830.1670	Discussion of Formation of Impurities	50275901	Atticus, LLC	OWN	
830.1700	Preliminary Analysis				Not required
830.1750	Certified Limits	50275901	Atticus, LLC	OWN	
830.1800	Enforcement Analytical Method	50275901 50275902	Atticus, LLC Atticus, LLC	OWN OWN	
830.6302	Color	50275902	Atticus, LLC	OWN	
830.6303	Physical State	50275902	Atticus, LLC	OWN	
830.6304	Odor	50275902	Atticus, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	50275902	Atticus, LLC	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	50275903	Atticus, LLC	OWN	Waiver ¹
830.6315	Flammability	50275902	Atticus, LLC	OWN	
830.6316	Explosibility	50275903	Atticus, LLC	OWN	Not required ²
830.6317	Storage Stability	50275902	Atticus, LLC	OWN	
830.6319	Miscibility	50275902	Atticus, LLC	OWN	

Signature 	Name and Title Nicole O'Loughlin Regulatory Consultant	Date Jun. 1, 2017
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date Jun. 1, 2017	EPA Reg No./File Symbol 91234-XX	Page 2 of 4
Applicant's/Registrant's Name & Address Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	Product A228.01	

Ingredient: Fluazinam (CAS No. 79622-59-6; Chemical Code: 129098)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6320	Corrosion Characteristics	50275902	Atticus, LLC	OWN	
830.6321	Dielectric Breakdown Voltage	50275903	Atticus, LLC	OWN	Not required ³
830.7000	pH	50275902	Atticus, LLC	OWN	
830.7050	UV/Visible Absorption	50275903	Atticus, LLC	OWN	Not required ⁴
830.7100	Viscosity	50275902	Atticus, LLC	OWN	
830.7200	Melting Point/Melting Range	50275903	Atticus, LLC	OWN	Not required ⁴
830.7220	Boiling Point/Boiling Range	50275903	Atticus, LLC	OWN	Not required ⁴
830.7300	Density/Relative Density/Bulk Density	50275902	Atticus, LLC	OWN	
830.7370	Dissociation Constants in Water	50275903	Atticus, LLC	OWN	Not required ⁴
830.7520	Particle size, fiber length, and diameter distribution	50275903	Atticus, LLC	OWN	Waiver ⁵
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	50275903	Atticus, LLC	OWN	Not required ⁴
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	50275903	Atticus, LLC	OWN	Not required ⁴
830.7860	Water Solubility: Generator Column Method				See 830.7840
830.7950	Vapor Pressure	50275903	Atticus, LLC	OWN	

Signature 	Name and Title Nicole O'Loughlin Regulatory Consultant	Date Jun. 1, 2017
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DATA MATRIX

Date Jun. 1, 2017	EPA Reg No./File Symbol 91234-XX	Page 3 of 4
Applicant's/Registrant's Name & Address Atticus, LLC 501 Cascade Pointe Lane, Suite 102 Cary, NC 27513	Product A228.01	

Ingredient: Fluazinam (CAS No. 79622-59-6; Chemical Code: 129098)

[illegible]

Signature	Name and Title	Date
	Nicole O'Loughlin Regulatory Consultant	Jun. 1, 2017

Endnotes for Data Matrix for A228.01

¹ **830.6314** – This product does not contain any oxidizing or reducing agents; therefore, Atticus, LLC requests a waiver for this data requirement.

² **830.6316** – This product does not contain explosive components and therefore, this data requirement is not required.

³ **830.6321** – This product is not intended for use around electrical equipment and therefore, this data requirement is not required.

⁴ **830.7050, 830.7200, 830.7220, 83.7370, 830.7550, 830.7840** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

⁵ **830.7520** – This product is not water insoluble and is not a fibrous material; therefore, Atticus, LLC requests a waiver for this data requirement.



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WASHINGTON, D.C. 20460

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OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

- Contains Confidential Business Information -

DP BARCODE No.: 441266; **FILE SYMBOL No.:** 91234-GU; **PRODUCT NAME:** A228.01;
DECISION No.: 530140; **PC Code(s):** 129098; **ACTION CODE:** R301; **FOOD Use:** NO

DATE OUT: August 28, 2017

SUBJECT: End Use Product Chemistry Review for "A228.1."
- Substantially Similar ("Me-Too") Registration Claim

FROM: María I. Rodríguez, Chemist
Product Chemistry Reviewer
CITAB/RD (7505P)

María I. Rodríguez
August 28, 2017.

THROUGH: Shyam Mathur, Ph. D.
Product Chemistry Team Leader
CITAB/RD (7505P)

S. Mathur
9/28/17

TO: Lisa Pahel/Erik Kraft, RM #24
FHB/RD (7505P)

INTRODUCTION:

The CITAB (Chemistry) has been asked to determine the acceptability of supporting Product Chemistry data submitted with this application.

Registrant: Pyxis Regulatory Consulting, Inc., On Behalf of Atticus, LLC

Application Date: June 2, 2017

Proposed Product: Fungicide – pyridinamine class

Supporting Data: Basic CSF, Data Matrix (06-01-2017), Label, Studies with MRID Nos 502759-01 to -03
Claim: Substantially Similar to EPA Reg No 228-737 ("NUP-15013 Fungicide")

45/90-Day Completeness Screen: 07-21-2017 (MIRodriguez); NO Deficiencies Listed

SUMMARY OF FINDINGS:

1. Name(s) of Active Ingredient(s): Fluazinam (40%)
2. Has the registrant claimed substantial similarity to a registered product? [X] Yes; [] No
EPA Reg No 228-737 ("NUP-15013 Fungicide")

DP BARCODE No.: 441266; FILE SYMBOL No.: 91234-GU; PRODUCT NAME: A228.01;
DECISION No.: 530140; PC Code(s): 129098; ACTION CODE: R301; FOOD Use: NO

3. All of the source materials of the active ingredients are derived from registered sources: ☒ Yes; ☐ No
EPA Reg No. [REDACTED]

4. All inert ingredients have been screened by CITAB (Inerts) and found to be approved for the proposed labeled use(s): ☒ Yes; ☐ No

-Approved for non-food use (06-09-2017, SM)

5. Confidential Statement(s) of Formula (CSFs):

☒ Proposed Basic CSF: Dated: 05-09-2017; Revised: NA

☐ Proposed Alternate CSF: Dated: NA; Revised: NA

6. Product label:

a. Ingredient statement: Nominal concentration (NC) of AIs listed on CSF concur with product label (PR Notice 91-2): ☒ Yes; ☐ No

Is the sub statement in compliance with PR Notice 97-6 (inert ingredients vs other ingredients)?

☒ Yes; ☐ No

Metallic equivalent: ☐ Yes; ☐ No; ☒ NA

Soluble arsenic: ☐ Yes; ☐ No; ☒ NA

Isomeric ratios: ☐ Yes; ☐ No; ☒ NA

Acid Equivalent: ☐ Yes; ☐ No; ☒ NA

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☐ No; ☒ NA

Methanol at > 4%: ☐ Yes; ☐ No; ☒ NA

Sodium nitrate/Sodium Nitrite: ☐ Yes; ☐ No; ☒ NA

c. Physical-chemical hazard statement: Product label requires a statement *per* 40 CFR §156.78 for flammability, explosive potential or electric insulator breakdown? ☐ Yes; ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes; ☒ No

7. Group A: Product Chemistry Data – Product Identity, Composition, and Analysis

Guideline Number	Study Title		Data Submitted		CITAB's Assessment of CHEMISTRY Data	MRID Number Cited
			Yes	No		
830.1550	Product Identity & Composition		X		A	502759-01 (MSDSs provided)
830.1600	Description of materials used to produce the product		X		A	502759-01
830.1620	Description of the production process		----	----	NA	NA
830.1650	Description of formulation process		X		A	502759-01
830.1670	Discussion on the formation of impurities		X		A	502759-01
830.1700	Preliminary analysis		----	----	NA	NA
830.1750	Certified limits (158.350)	Standard certified limits	X		A	502759-01 Basic CSF (05-09-2017)
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	502759-01 502759-02 HPLC

A = Acceptable; N = Not Acceptable; G = Data Gap; W = Waiver request; NA = Not applicable;
 I = In Progress; U = Upgradeable

8. Group B: Product Chemistry Data – Physical and Chemical Characteristics

Guideline Number	Study Title	Value or Qualitative Description	CITAB's Assessment of CHEMISTRY Data	MRID Number Cited
830.6302	Color	Yellow	A	502759-02
830.6303	Physical State	Liquid	A	502759-02
830.6304	Odor	Pungent odor	A	502759-02
830.6313	Stability to normal and elevated temperatures, metals and metal ions	NA; will not be in contact with metals and metal ions	NA	502759-02
830.6314	Oxidation/reduction	NA; does not contain oxidizing or reducing agents	NA	Data Matrix 502759-03
830.6315	Flammability	Flashpoint > 100 °C	A	502759-02
830.6316	Explodability	NA; does not contain explosive components	NA	Data Matrix 502759-03
830.6317	Storage stability	Stable for 2 weeks @ 54 °C	A	502759-02
830.6319	Miscibility	-Miscible: with water – homogeneous for 30 min @ 25 °C -Not miscible: with solvent oil 150 or acetone – observed separation of solid matter after mixing for 30 min @ 25 °C	A	502759-02
830.6320	Corrosion characteristics	Stable for 2 weeks @ 54 °C (FI-HPDE bottles)	A	502759-02
830.6321	Dielectric Breakdown Voltage	NA; not intended for use around electrical equipment	NA	Data Matrix 502759-03
830.7000	pH	5.5 – 7.5 (5.81 in study table)	A	502759-02
830.7050	UV/Visible Absorption	NA	NA	Data Matrix 502759-03
830.7100	Viscosity	115.27 mPa s @ 20°C	A	502759-02
830.7200 830.7220	Melting Point Boiling Point	NA	NA	Data Matrix 502759-03
830.7300	Density/Relative Density/Bulk Density (Specific Gravity)	1.27 g/mL @ 20 °C	A	502759-02
830.7370	Dissociation Constants in Water	NA	NA	502759-03
830.7520	Particle Size	NA; not water insoluble & not a fibrous material	NA	Data Matrix 502759-03
830.7550 830.7560 830.7570	Partition Coefficient (n-octanol/water)	NA	NA	Data Matrix 502759-03
830.7840 830.7860	Water Solubility	NA	NA	Data Matrix 502759-03
830.7950	Vapor Pressure	NA	NA	502759-03

A = Acceptable; N = Not Acceptable; G = Data Gap; W = Waiver request; NA = Not applicable; I = In Progress; U = Upgradeable
 * Summary and Waiver Requests

C. CONCLUSIONS:

CITAB has reviewed the Product Chemistry data submitted and has concluded that:

A. Substantial Similarity to the Cited Product from Product Chemistry View Point

- ☐ Similar to cited product
- ☒ Not similar to cited product, EPA Reg No 228-737 ("NUP-15013 Fungicide")
 - The inerts are different for both products
- ☐ Identical to the cited product in chemical composition
- ☐ Not identical
- ☐ Not applicable

B. Confidential Statement(s) of Formula

1. Basic CSF (dated 05-09-2017)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

2. Alternate CSF

- ☐ Acceptable
- ☐ Not Acceptable
- ☒ Not Applicable

C. Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): *cite Guideline(s)*
- ☐ Not required
- ☐ Data cited

D. Group B Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): *cite Guideline(s)*
- ☐ Not required
- ☐ Data cited

E. Product Label/Draft Label

Recommendations – Yes ☐; No ☒



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

- Contains Confidential Business Information -

DP BARCODE No.: 441266; **FILE SYMBOL No.:** 91234-GU (Screen); **PRODUCT NAME:** A228.1;
DECISION No.: 530140; **PC Code(s):** 129098; **ACTION CODE:** R301; **FOOD Use:** NO

DATE OUT: July 21, 2017

SUBJECT: 45/90-Day Completeness Screen Results for End-Use Product "A228.1."

FROM: Maria I. Rodriguez, Product Chemistry Reviewer, CITAB/RD (7505P)

TO: Lisa Pahel/Erik Kraft, RM #24, FHB/RD (7505P)

Company Name: Pyxis Regulatory Consulting, Inc., On Behalf of Atticus, LLC

Active Ingredient(s): Fluazinam

MRID No(s): 502759-01, -02, -03

CONCLUSIONS:

Deficiencies: NO

(If there are deficiencies, they are indicated below each heading as "Note 1, Note 2, etc.")

Group A Data: Submitted

Group B Data: Submitted

CSF(s): Submitted

Basic CSF: dated 05-09-2017

DRAFT Product Label: Submitted

Note to PM Team Reviewer: If deficiencies are found in the screen results, please inform the Registrant ("10-Day Letter") and provide me with the corrected deficiencies. I will attach the new information to the original bean sheet if the data package is still in CITAB. A new bean sheet will be required if the original bean sheet has been closed by CITAB.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION

20/JUN/2017

MEMORANDUM

Subject: Name of Pesticide Product: A228.01
EPA Reg. No. /File Symbol: 91234-GU
DP Barcode: D440783
Decision No: 530140
Action Code: R301
PC Code: 129098 (fluazinam)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

Through: P.V. Shah, PhD, Chief
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

To: Erik Kraft, Risk Manager Team 24
Fungicide and Herbicide Branch
Registration Division (7505P)

Applicant: Atticus, LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

P.V. Shah
6/22/2017

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Fluazinam	40
Other ingredients:	60
Total:	100

ACTION REQUESTED: Similarity determination for 91234-GU, proposed product, and 228-737, cited product.

BACKGROUND: Atticus, LLC has applied for registration of A228.01, EPA File Symbol 91234-GU, claiming to be substantially similar to NUP-15013 Fungicide, EPA Reg. No. 228-737. Both products contain 40% fluazinam. The submission includes a basic CSF dated May 9, 2017, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies with MRIDs 496085-03 to -08. A search of the OPP electronic databases shows that these studies were submitted to support the registration of the cited product, 228-737. They were reviewed and classified as acceptable in a 2016 CITAB memo (McAndrew; D432894; EPA File Symbol 228-TGT; 30/AUG/2016).

RECOMMENDATIONS:

1. We compared the basic CSFs and labels of the proposed product, 91234-GU, and the cited product, 228-737, and determined that the two products are substantially similar.
2. The cited acute toxicity studies are acceptable to support this registration.
3. The acute toxicity profile for the proposed product, A228.01, EPA File Symbol 91234-GU, based on 228-737, is as follows:

acute oral toxicity	III	cited	MRID 49608503
acute dermal toxicity	III	cited	MRID 49608504
acute inhalation toxicity	III	cited	MRID 49608505
primary eye irritation	IV	cited	MRID 49608506
primary skin irritation	IV	cited	MRID 49608507
dermal sensitization	positive	cited	MRID 49608508

4. The proposed basic CSF submitted for 91234-GU must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 091234-GU

PRODUCT NAME: A228.01

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear: Long-sleeved shirt and long pants, socks, shoes and waterproof gloves.

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

Memorandum

E-SUBMISSION

Date: 6 / 9 / 17

To: PM 24, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 09, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

PYXIS REGULATORY CONSULTING, INC.
ATTICUS, LLC.
4110 136TH STREET CT NW
GIG HARBOR , WA 98332-9122

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 02-JUN-17. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

MRID 502759-00

June 2, 2017

ELECTRONIC SUBMISSION

Shaja Joyner (PM 24)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Atticus, LLC – A228.01 (EPA Reg. No. 91234-)
Application for New Pesticide Registration

Dear Ms. Joyner,

On behalf of Atticus, LLC (EPA Co. No. 91234), please find the enclosed application for registration of A228.01, an end-use product containing fluazinam as the active ingredient.

In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (EPA Form 8570-4) (Basic Formulation dated 5/9/2017)
4. One (1) copy of the proposed labeling
5. Formulator's Exemption Statement (EPA Form 8570-27)
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letters of Authorization from study sponsors
10. Letter of Authorization from Atticus, LLC
11. Product Specific Data:


MRID No.	Guideline	Report Title
50275901	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	O'Loughlin, N.A. Product Identity and Composition, Description of Starting Materials and Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for A228.01. 119 p. [Contains confidential attachment]
50275902	830.6302, 830.6303, 830.6304, 830.6315, 830.6319, 830.6320, 830.7000, 830.7100, 830.7300 OECD 109, 114, 115	Wen, H. Chemical and Physical Characterization of Fluazinam 500 g/L SC: Color, Physical State, Odor, Miscibility, pH, Density, Surface Tension, Particle Size Distribution, Corrosion Characteristics, Stability, Flash Point, Viscosity, Suspensibility and Persistent Foam. 67 p.

MRID No.	Guideline	Report Title
50275903	830.6314, 830.6316, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7520, 830.7550-830.7570, 830.7840-830.7860, 830.7950	O'Loughlin, N.A. Waiver Request for Certain Data Requirements for A228.01. 7 p.

Atticus, LLC believes this application falls under Category R301 (45) since A228.01 is a new product substantially similar to a registered product, with a registered source of active ingredient, only product chemistry data are being submitted to support the application for registration, and the selective method of support is used to satisfy acute toxicity data requirements. The PRIA fee (\$1,897.00) has been paid and the review time is 4 months.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Nicole O'Loughlin

Enclosures

cc: R. Canady; Atticus, LLC
D. Bolin; Atticus, LLC

21-Day Screen Completed by
Contractor

21-Day Expires on 6-23-17

Jacket # 91234-GU

MRID# 502759

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

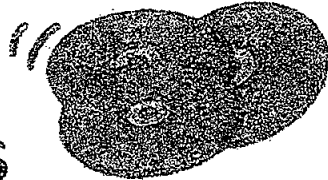
Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

MEREDITH LAWS

530140

NEW APPLICATIONS



JUN 8 2 2017

DATE: _____

FILE REG NUMBER: 91234-GU

FEP (OPPIN ENTRY): BD JUN 8 2 2017

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

SIG: _____

(Initial & Date)

FILE ROOM: _____

(Initial & Date)

ASSIGN TO PM: AD _____ RD 24 BPPD _____

_____ JACKET TO SHELF (DATA)

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 6-2-17

Experts In-Processing Signature: B.O. Date 6-8-17 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>91234-GU</u>		EPA Receipt Date: <u>6-2-17</u>				
Items for Review			Yes	No	N/A*	
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes X	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes X	no			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: Pass
 - Required forms are complete

Inerts: Pass
 - Inerts approved for Non-Food Use

PRN 11-3: Pass
 - MRID: 502759

Overall status: Pass
 Sm 6/9/17

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

R 300 and 301

100% identical (repack): YES or NO (circle one)

{If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are not required}

Data on Group A and B must be submitted - Group A and B can not be cited.

Guideline No.	Group A: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.1550	Product Identity & Composition	X	
830.1600	Description of materials used to produce the product	X	
830.1650	Description of formulation process	X	
830.1670	Discussion on the formation of impurities	X	
830.1700	Preliminary analysis	X	
830.1750	Certified limits (158.345)	X	
830.1800	Enforcement analytical method	X	

Guideline No.	Group B: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.6302	Color	X	
830.6303	Physical State	X	
830.6304	Odor	X	
830.6314	Oxidation/Reduction (Chemical incompatibility)	X	
830.6315	Flammability	X	
830.6316	Explosibility	X	
830.6317	Storage stability	X	
830.6319	Miscibility	X	
830.6320	Corrosion Characteristics	X	
830.6321	Dielectric Breakdown voltage	X	
830.7000	pH	X	
830.7100	Viscosity	X	
830.7300	Density	X	

R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cited	
		Yes	No
870.1100	Acute Oral (LD50)	X	
870.1200	Acute Dermal (LD50)	X	
870.1300	Acute Inhalation (LC50)	X	
870.2400	Acute Eye Irritation	X	
870.2500	Acute Dermal Irritation	X	
870.2600	Dermal Sensitization	X	

Efficacy – which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline No.	Efficacy Study Titles	Cited		Comments
		Yes	No	
810.3100	Soil Treatments for Imported Fire Ants			N/A
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments			N/A
810.3300	Treatments to Control Pests of Humans and Pets			N/A
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments			N/A
810.3500	Premises Treatments			N/A
810.3600	Structural Treatments			N/A
810.3800	Methods for Efficacy Testing of Termite Baits			N/A

Fee for Service

{1004511Â~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 24

Receipt No.

S- 1004511

EPA File Symbol/Reg. No.

91234-GU

Pin-Punch Date:

6/2/2017

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R301

Granted: R301

Amount Due: \$ 1897

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Jill Herrick

Date: 6/7/17

Remarks:

SIM CLINIC

DOCUMENTUM



Receipt for Section 3

S: 1004511

Milestone Email: Nicole@PyxisRC.com

Regulatory Type: Product Registration - Section 3



Resubmission: ☐ Yes ☒ No

Application Type: New Registration



Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No



Print Letter

Enter More Information

Tracking

Company: 91234 ATTICUS, LLC.

Risk Manager: Registration Division, Risk Management Team 24



Product #: 91234-GU

Product Name: A228.01

Override#:

☒ Me Too Section 3: 228-737

Me Too Product Name: NUP-15013 Fungicide

Application Date: 02-Jun-2017



OPP Rec'd Date: 02-Jun-2017



Front End Date: 06-Jun-2017



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg# 20106. PRIA R301. EUP registration

Receipt Content

Study

CSF

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

DOCUMENTUM



Receipt

Your payment is complete

Pay.gov Tracking ID: 262QH03C

Agency Tracking ID: 75256886511

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1,897.00

Transaction Date: 06/02/2017 12:13:58 PM EDT

Payment Date: 06/02/2017

Registration Number:

Company Name: Atticus, LLC

Company Number: 91234

Action Code: R301

Account Information

Cardholder Name: Kerrie Fersch

Card Type: Master Card

Card Number: *****3548

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

kerrie.ihnen@cselifescience.com

DOCUMENTUM

 Environmental Protection Agency United States Washington, DC 20460	<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number Atticus, LLC / 91234-XX	2. EPA Product Manager S. Joyner	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Atticus, LLC / A228.01	PM# 24	
5. Name and Address of Applicant (include ZIP Code) Atticus, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>228-737</u> Product Name <u>NUP-15013 Fungicide</u>	

Section - II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

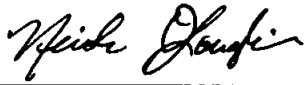
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Atticus, LLC believes this application falls under Category R301 (45) since A228.01 is a new product, with a registered source of active ingredient, selective data citation is used for product specific acute toxicity data, and only product chemistry data are being submitted to support the application for registration. The PRIA fee (\$1,897) has been paid. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>* Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
	If "Yes" Unit Packaging wgt. _____	No. per container _____	If "Yes" Package wgt. _____	No. per container _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Nicole O'Loughlin	Title Regulatory Consultant	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Nicole O'Loughlin	5. Date Jun. 02, 2017	

DOCUMENTUM



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

MRID 502759-00

June 2, 2017

ELECTRONIC SUBMISSION

Shaja Joyner (PM 24)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Atticus, LLC – A228.01 (EPA Reg. No. 91234-)
Application for New Pesticide Registration

Dear Ms. Joyner,

On behalf of Atticus, LLC (EPA Co. No. 91234), please find the enclosed application for registration of A228.01, an end-use product containing fluazinam as the active ingredient.

In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (EPA Form 8570-4) (Basic Formulation dated 5/9/2017)
4. One (1) copy of the proposed labeling
5. Formulator's Exemption Statement (EPA Form 8570-27)
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letters of Authorization from study sponsors
10. Letter of Authorization from Atticus, LLC
11. Product Specific Data:

MRID No.	Guideline	Report Title
50275901	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	O'Loughlin, N.A. Product Identity and Composition, Description of Starting Materials and Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for A228.01. 119 p. [Contains confidential attachment]
50275902	830.6302, 830.6303, 830.6304, 830.6315, 830.6319, 830.6320, 830.7000, 830.7100, 830.7300 OECD 109, 114, 115	Wen, H. Chemical and Physical Characterization of Fluazinam 500 g/L SC: Color, Physical State, Odor, Miscibility, pH, Density, Surface Tension, Particle Size Distribution, Corrosion Characteristics, Stability, Flash Point, Viscosity, Suspensibility and Persistent Foam. 67 p.

DOCUMENTUM

MRID No.	Guideline	Report Title
50275903	830.6314, 830.6316, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7520, 830.7550-830.7570, 830.7840-830.7860, 830.7950	O'Loughlin, N.A. Waiver Request for Certain Data Requirements for A228.01. 7 p.

Atticus, LLC believes this application falls under Category R301 (45) since A228.01 is a new product substantially similar to a registered product, with a registered source of active ingredient, only product chemistry data are being submitted to support the application for registration, and the selective method of support is used to satisfy acute toxicity data requirements. The PRIA fee (\$1,897.00) has been paid and the review time is 4 months.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) Nicole@PyxisRC.com if you have any questions or need any additional information.

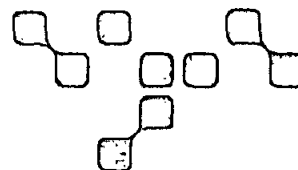
Sincerely,



Nicole O'Loughlin

Enclosures

cc: R. Canady; Atticus, LLC
D. Bolin; Atticus, LLC



April 25, 2017

Erik Kraft (PM 24)
Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Letter of Authorization for Atticus, LLC (EPA Company No. 91234)

Dear Mr. Kraft,

Proventis Lifescience Limited located at Unit 1701, 17th Floor, The Sun's Group Centre, No. 200 Gloucester Road, Wanchai, Hong Kong, formerly 8/F Admiralty Centre Tower 2, 18 Harcourt Road, Admiralty, Hong Kong was a sponsor of the following study and hereby authorizes the use of these data by Atticus, LLC (EPA Company No. 91234) in support of their application for registration of their product A228.01 pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), Sec. 3 [7 U.S.C. Section 136 et seq.]:

Study	Study Number
Wen, H. Chemical and Physical Characterization of Fluazinam 500 g/L SC: Color, Physical State, Odor, Miscibility, pH, Density, Surface Tension, Particle Size Distribution, Corrosion Characteristics, Stability, Flash Point, Viscosity, Suspensibility and Persistent Foam. July 10, 2013.	NC-2012-061

Sincerely,

Shuo Jiang
Director
Proventis Lifescience Limited

DOCUMENTUM

[Note to reviewer: [Text] in brackets denotes optional or explanatory language]
[Note to reviewer: {Text} in braces denotes where in the final label text will appear]

{BOOKLET FRONT PANEL LANGUAGE}

GROUP	29	FUNGICIDE
-------	----	-----------

A228.01™

[Alternate brand name: Detour 4 SC]

Active Ingredient:	(% by weight)
Fluazinam: 3-chloro- <i>N</i> -[3-chloro-2,6-dinitro-4-trifluoromethyl] phenyl]-5-trifluoromethyl-2- pyridinamine(CA).....	40.0%
Other Ingredients	60.0%
Total	100.0%
Contains 4.24 pounds fluazinam per gallon (508 grams per liter)	

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

EPA Reg. No.: 91234-XX

EPA Est. No.:

Net Contents:

Manufactured For:
Atticus, LLC
501 Cascade Pointe Lane, Suite 102
Cary, NC 27513

{LANGUAGE INSIDE BOOKLET}

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

For Chemical Emergency
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night
Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before use. Do not take internally.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Coveralls worn over long-sleeved shirt, long pants,
- Chemical-resistant gloves made of any waterproof material (such as polyethylene or polyvinyl chloride),
- Protective eyewear,
- Chemical resistant footwear and socks

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Do not allow contact of contaminated clothing with unprotected skin.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break down. Do not allow contact between contaminated sprayer parts and unprotected skin. Ensure sprayer is washed down daily.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas. Runoff and drift from treated areas may be hazardous to aquatic organisms in neighboring areas.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Failure to follow the use directions and precautions on this label may result in turf injury, poor disease control, and/or illegal residues. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Turf grasses on golf courses are not within the scope of the Worker Protection Standard. **Do not enter treated areas until sprays have dried.**

PRODUCT INFORMATION

This product is a broad-spectrum fungicide for use to control diseases of turf grasses on golf courses only. This product may be applied with all types of spray equipment normally used for ground applications on golf courses. Apply this product in sufficient water to obtain adequate uniform coverage of the turf. Apply in a minimum spray volume of 50 gal of water per acre.

USE RESTRICTIONS

- Do not apply this product to home lawns (turf) or any other residential turf
- Do not apply this product by aerial application
- Do not apply this product through any irrigation system
- Do not apply this product within 25 feet of permanent water bodies (lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, and estuaries)
- Do not apply this product within 100 feet of any water bodies that connect with any off-site water bodies such as a freshwater lake, pond, river, stream or wetland in the State of New York.

- Do not apply this product when the wind direction is toward aquatic areas to minimize drift to these areas.
- Do not exceed 253 fl. oz. of this product (8.4 lbs. active ingredient) per acre per year.
- Do not apply more than twelve (12) applications at 0.5 fl. oz./1000 sq. ft. per year.

USE PRECAUTIONS

- Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.
- Where states have more stringent regulations, they must be observed.

INTEGRATED PEST MANAGEMENT

This product is an excellent disease control agent when used according to label directions for control of a broad spectrum of listed plant diseases. This product is for use in programs which are compatible with the principles of Integrated Pest Management (IPM), which may include the use of disease resistant crop varieties, cultural practices, biological control agents, pest scouting and disease forecasting systems aimed at preventing economic pest damage and reducing unnecessary applications of pesticides. Practices known to reduce disease development should be followed. Consult your state cooperative extension service or local agricultural authorities for additional IPM strategies established in your area. This product may be used in State Agricultural Extension advisory (disease forecasting) programs that recommend application timing based on environmental factors which favor disease development.

RESISTANCE MANAGEMENT

Some plant pathogens are known to develop resistance to products used repeatedly for disease control. This product is effective for strategic use in fungicide disease management programs that attempt to minimize disease resistance to fungicides. This product has a multi-site mode of action that disrupts the energy production in the fungus. It is listed in FRAC code 29, as an uncoupler of oxidative phosphorylation. Some other fungicides, which are at risk from disease resistance, exhibit a single-site mode of fungicidal action. This product, with its multi-site mode of action, may be used to prevent or delay the development of resistance to single-site fungicides when used as a tank-mix partner or alternated in a disease management program.

This product has demonstrated excellent control of *Sclerotinia homeocarpa*, *Lanzia* and *Moellerodiscus* strains (causing Dollar Spot) that are insensitive to several classes of fungicides.

Consult with your Federal or State Cooperative Extension Service representatives for guidance on the proper use of this product in programs that seek to minimize the occurrence of disease resistance to other fungicides. This product is an excellent partner for those products that specify the use of a protectant or other fungicide that has a different mode of action.

PLANT TOLERANCE

NOTE TO USER: Although this product has been evaluated on several turf species with no indication of phytotoxicity, neither the manufacturer nor seller has determined whether or not THIS PRODUCT can be used safely on all turf species. The professional user should determine if this product can be used safely prior to commercial use by testing on the type of turf to be treated as recommended rates for phytotoxicity.

MIXING AND SPRAYING

This product can be used effectively in dilute sprays. Thorough, uniform coverage is essential for disease control.

NOTE: Slowly invert container several times to assure uniform mixture.

Prepare only the amount of spray mixture required for immediate use. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary for proper dispersal of the product. Maintain maximum agitation throughout the spraying operation. Do not allow spray mixture to stand overnight or for prolonged periods in the spray tank. Spraying equipment should be thoroughly cleaned immediately after the

application.

Product Alone: Fill the spray tank with half of the required amount of water with the agitator running, add this product to the spray tank. Continue agitation while adding the remainder of the water. Begin application of the solution after this product has completely dispersed into the mix water. Maintain agitation until all of the mixture has been applied.

Tank Mixtures: It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture. This product is physically compatible with many products recommended for control of diseases, liquid fertilizers, growth regulators, insecticides and biological control products. If tank mixes are desired, read and follow all directions, precautions, and limitations on labeling of all products used. This product must not be mixed with any product which prohibits such mixing. It is the applicator's responsibility to ensure that the companion product is EPA approved for use on the intended site. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are registered.

This product is generally compatible with the products mentioned above, provided sufficient free water is available for dispersion of all the tank mix products. However, the physical compatibility of this product with tank mix partners should be evaluated before use. A jar test should be conducted with the intended tank-mix products prior to preparation of large volumes. Use the following procedure:

Jar Compatibility Test:

1. Pour the recommended proportions of the products into a suitable container of water;
2. Mix thoroughly; and
3. Allow to stand for 5 minutes.

If the combination remains mixed or can be re-mixed readily, it is considered physically compatible. Any physical incompatibility in the jar test indicates that this product should not be used in the tank mix.

Consult compatibility charts or your local or state agricultural authorities for additional compatibility information.

To prepare spray solution:

- Add ½ of the required amount of water to the mix/sprayer tank.
- Start the agitator running before adding any tank mix partners.
- Add the tank mix partners in the following order:
 - Products packaged in water-soluble packaging;
 - Wettable powders;
 - Wettable granules (dry flowables);
 - Liquid flowables (such as this product);
 - Liquids; and
 - Emulsifiable concentrates
- Always allow each tank mix partner to become fully dispersed before adding the next product.
- Provide sufficient agitation while adding the remainder of the water.
- Maintain agitation until all of the mixture has been applied.
- When using this product in tank mixtures, add all products in water-soluble packaging to the tank before any other tank mix partner, including this product.
- Allow the water-soluble packaging to completely dissolve and the product(s) to completely disperse before adding any other tank mix partner to the tank.

- Use a pump with capacity to maintain the correct rated pressure for the nozzles selected.
- Maintain sufficient agitation to keep mixture in suspension.
- Use a jet agitator, liquid sparge tube, or mechanical paddle for agitation.
- Use screens to prevent nozzles from clogging. Use 50-mesh or coarser screens placed after the tank and before the nozzles. Check nozzle manufacturer's recommendations.
- For more information on spray equipment and calibration, consult sprayer manufacturers and state recommendations.

TURFGRASS DISEASE CONTROL

1. Use this product in a Preventative Disease Control Program.
2. Apply in sufficient water to ensure thorough coverage.
3. Apply after mowing or allow sprayed area to completely dry before mowing.
4. For control of foliar diseases, allow sprayed area to completely dry before irrigation.
5. For optimum turf quality and disease control, use this product in conjunction with turf management practices that promote good plant health and optimum disease control.
6. Evaluate spray additives prior to use. Label directions are based on data obtained with no additives.
7. Before use of any fungicide, proper diagnosis of the organism causing the disease is important. Use of diagnostic kits or other means of identification of the disease organism is essential to determine the best control measures.

USE RATE			
Diseases Controlled Pathogen(s)	Application Interval (days)	Rate fl. oz. product/1000 sq. ft.	Instructions for Use on Golf Course Tees, Greens, Fairways and Roughs
Dollar Spot <i>Sclerotinia homeocarpa</i> <i>Lanzia</i> spp. <i>Moellerodiscus</i> spp.	14	0.5	Apply as a preventative disease program, starting when conditions become favorable for disease. For broad spectrum disease control or for control greater than 14 days, tank mix with the labeled rate of another fungicide labeled for control of this disease.
Leaf spot, Melting-out, Brown blight <i>Drechslera</i> spp. (including <i>D. poae</i> , <i>D. siccans</i>)	14	0.5	Apply when conditions become favorable for disease. For broad spectrum disease control tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Brown patch Large patch <i>Rhizoctonia solani</i>	14	0.5	Begin applications in May or June before disease is present for Brown patch. To control Large patch, apply in fall when temperature drops below 70°F. For broad spectrum control or for control greater than 14 days, tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Red Thread <i>Laetisaria fuciformis</i>	14	0.5	Apply when conditions become favorable for disease.

USE RATE			
Diseases Controlled Pathogen(s)	Application Interval (days)	Rate fl. oz. product/1000 sq. ft.	Instructions for Use on Golf Course Tees, Greens, Fairways and Roughs
Anthracnose <i>Colletotrichum cereal</i>	14	0.5	Applications should be made prior to infection. Alternate or tank mix this product with another fungicide for anthracnose disease prevention. This product should be tank mixed with the labeled rate of another fungicide labeled for control of this disease.
Gray Snow Mold <i>Typhula</i> spp. Pink Snow Mold <i>Microdochium nivale</i>	Late Fall	0.5	Apply one to two applications in the late fall before snow cover. Do not apply on top of the snow. For optimum disease control, tank mix with the labeled rate of another fungicide labeled for control of these diseases.
Pink patch <i>Microdochium nivale</i>	14	0.5	Apply in the fall or early spring when conditions are favorable for disease development. For optimum disease control, tank mix with the labeled rate of another fungicide labeled for control of this.
Stem rust <i>Puccinia graminis</i> var. <i>graminicola</i>	14	0.5	Apply on a preventative schedule when disease conditions are favorable (cool and cloudy weather).
Algal scum (filamentous blue-green algae/cyanobacteria)	14	0.5	This product should be tank mixed with another fungicide labeled for control of this disease, such as Protect™ DF.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

PESTICIDE STORAGE: Store in original container in a secured, cool, dry place separate from food and feed. **DO NOT** store near heat or open flame.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

[Nonrefillable Containers 5 Gallons or Less]

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. Triple rinse container (or equivalent) promptly after emptying. **Triple rinse as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic containers are also disposable by incineration.

[Nonrefillable containers larger than 5 gallons]

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at

least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. *Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.*

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. *Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.*

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

A228.01 is a trademark of Atticus, LLC

{LANGUAGE ON LABEL AFFIXED TO CONTAINER}

GROUP 29 FUNGICIDE

A228.01™

Active Ingredient: (% by weight)
 Fluazinam: 3-chloro-N-[3-chloro-2,6-dinitro-4-trifluoromethyl) phenyl]-5-trifluoromethyl-2- pyridinamine(CA)..... 40.0%
Other Ingredients 60.0%
Total..... 100.0%

Contains 4.24 pounds fluazinam per gallon (508 grams per liter)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

**For Chemical Emergency
Spill, Leak, Fire, Exposure, or Accident
Call CHEMTREC Day or Night**

Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before use. Do not take internally.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the

mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply when weather conditions favor drift from treated areas. Runoff and drift from treated areas may be hazardous to aquatic organisms in neighboring areas.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.

PESTICIDE STORAGE: Store in original container in a secured, cool, dry place separate from food and feed. **DO NOT** store near heat or open flame.

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See inside label booklet for additional Precautionary Statements and Directions for Use.

Manufactured for:
 Atticus, LLC
 501 Cascade Pointe Lane, Suite 102
 Cary, NC 27513

**EPA Reg. No. 91234-XX
 EPA Est. No. _____**

NET CONTENTS:

